

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

MASSTECH COMMUNICATIONS, INC.,

Plaintiff,

v.

ROBERT CURRAN,

Defendant.

APR 29 2004 P 1:33

U.S. DISTRICT COURT  
DIST. OF MASS.

CIVIL ACTION  
NO.

**04 CV 10604 NG**

**PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER**

Pursuant to Mass. R. Civ. P. 65, plaintiff MassTech Communications, Inc. ("MTC") hereby moves this Court to enter the proposed Temporary Restraining order filed herewith and thereby enjoin the defendant, Robert Curran ("Curran") as follows:

- (a) from further use or dissemination of any database, customer list, or other confidential information and/or trade secrets of MTC;
- (b) from removing, destroying, or otherwise altering any computers or data storage devices in Curran's possession, custody, or control;
- (c) from direct or indirect competition with MTC and/or solicitation of MTC's customers and contacts.

In support of its motion, plaintiff relies on the Verified Complaint and Memorandum of Law filed herewith.

Respectfully Submitted,

**MASSTECH COMMUNICATIONS,  
INC.**

By its attorneys,



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Dated: March 29, 2004